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UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 10
1200 Sixth Avenue
Seattle, WA 98101

December 4, 2002

Reply To
Attn Of: ECL-113

Ms. Kathleen Hain, Manager
Environmental Restoration Program
U.S. Department of Energy
Idaho Operations Office
850 Energy Drive
Idaho Falls, Idaho 83401-1563

Re: EPA Review of the September 2002 *Explanation of Significant Differences to the Record of Decision for the Central Facilities Area Operable Unit 4-13 (Draft)*

Dear Ms. Hain,

EPA has reviewed the Explanation of Significant Differences for the remedial action selected in the OU 4-13 ROD for the CFA-04 Pond. Enclosed are a few comments on this document which include a request that additional information be incorporated into the ESD. In particular, entries in the tables presented in the ESD such as exposure pathways, hazard quotients, and remediation goals need to be better explained in the text of the ESD. This will enable readers to clearly understand the remedy change without having reviewed numerous supporting documents.

Please contact me at (206) 553-0040 if you have any questions concerning the enclosed comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Kathy Ivy".

Kathy Ivy
Remedial Project Manager

Enclosure

cc: Carol Hathaway, DOE-ID
Clyde Cody, IDEQ

**EPA November 2002 Comments on
the September 2002 Explanation of Significant Differences to the Record of Decision
for the Central Facilities Area Operable Unit 4-13 (Draft)**

General Comments

1. A signature page needs to be added to the ESD to include all three agencies as described in Section 7.3.2 of the EPA guidance, *A Guide to Preparing Superfund Proposed Plans, Records of Decision, and Other Remedy Selection Decision Documents*.
2. The acronym "FRG" is used throughout the document to describe both the remediation goal listed in the ROD and the proposed remediation goal listed in this ESD. It would be helpful if different terminology was used to describe the remediation values calculated for human health and the environment in the RI/FS; the remediation goal adopted in the ROD; the remediation values calculated for human health and the environment in the white paper; and the proposed remediation goal presented in this ESD. To further reduce confusion surrounding these numbers, the proposed remediation goal should be adopted as a final remediation goal prior to issuing this ESD.

Specific Comments

1. **Page 1, Section 1, third paragraph, first sentence:** The white paper, *Re-evaluation of the Final Remediation Goals for Mercury at the CFA-04 (CFA-674 Pond)*, should be included in the administrative record along with the ESD.
2. **Page 4, Section 3:** This section is difficult to understand if the reader has not already reviewed the ROD and the white paper. Some additional information should be included to clearly explain the remedy change to the public.
 - More detail should be included to explain the basis for the remediation goal for human health and the environment listed in the ROD as well as the basis for the revised remediation goal listed in this ESD (e.g. the ROD remediation goal of 0.5 mg/kg mercury was based on the ecological screening value of 10x background mercury levels). A comparison should be made between the revised remediation goal at CFA-04 and cleanup levels at other mercury sites at INEEL and elsewhere.
 - More information should be included in the text to explain the exposure pathways, exposure point concentration, hazard quotients, human health vs. ecological remediation values, and the ROD vs. the revised remediation goals. This information is listed in the tables, but the entries do not make a lot of sense with the limited explanation provided in the text.
 - More information should be added about changes resulting from the revised remediation goal, especially a discussion about cost savings.

3. Page 4, Section 3, third paragraph, last sentence: This sentence states that “risks” were not calculated for mercury. The sentence should specify that “risk for developing cancer” was not calculated for mercury.

4. Page 5, Table 3-2: The hazard quotient for the recalculated ecological remediation goal is listed as less than 10. The text should clarify that the hazard quotient for plants was calculated to be greater than 10 and briefly explain why this was considered acceptable.

5. Page 5, Section 3, second item, last sentence: The onsite disposal facility for non-hazardous and non-radioactive waste should be listed as the CFA Landfill.